



services, bills of lading, cargo and/or the like belonging to or claimed by the Defendants within this District held by various parties, as garnishees, including but not limited to electronic funds transfers.

4. Upon information and belief, Defendants Geden Operations Ltd. and Geden Lines, are continuously engaged in international shipping and conduct their business in U.S. Dollars. Geden Operations Ltd. of Malta is the wholly owned subsidiary of Geden Lines of Turkey. Geden Operations Ltd. was formed to concentrate on developing and in the Handymax vessel Market. *See excerpts from Geden Lines' Website annexed hereto as Exhibit "1."* The information from the website shows that "Geden" operates a fleet of 22 vessels. The charter party at issue in this case, which is attached to the Verified Complaint, requires at Clause 5 "Payment of said hire to be made in cash in United States Currency, every fifteen (15) days in advance..." Prior to breaching the charter party, Defendant Geden Operations had previously made eleven hire payments to Plaintiff, all in U.S. Dollars via electronic funds transfer to Plaintiff's designated account as required by Clauses 5 and 5(a) of the charter party. Like Geden Operations, it is also believed that its parent, Geden Lines, similarly operates in U.S. Dollars in respect of the commercial operation of its vessel fleet. Further, the written performance guarantee issued by Geden Lines in favor of Plaintiff, which guarantee is attached to the Verified Complaint, calls for payment to Plaintiff in U.S. Dollars in the event that Geden Lines fails to perform. For these reasons, there is good cause to conclude that both Geden Operations and Geden Lines regularly conduct their business in U.S. Dollars.

5. Nearly all companies engaged in the international shipping industry transact business in U.S. Dollars and therefore regularly have assets in New York City. Dollars are the *lingua franca* of international commerce.

6. All international U.S. dollars transfers are processed by intermediary banks in the United States, mainly in New York City. The Clearing House Interbank Payment System represents that it processes 95% of those transfers.

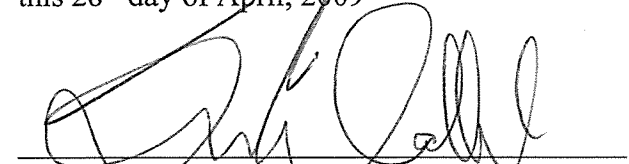
7. Plaintiff believes that some of Defendants' assets, to wit: bank accounts; payments from the purchasers of cargoes; freight and/or hire payments to or from owners of vessels, or charterers, to Defendant, and/or Clearing House Interbank Payment System (CHIPS) credits or funds being transferred through intermediary banks, are located in this District in the possession of garnishees located in New York, including, but not limited to, ABN Amro, American Express Bank, Bank of America, Bank of New York, Bank of China, BNP Paribas, Citibank, Deutsche Bank, HSBC Bank USA Bank, J.P. Morgan Chase, Societe Generale, Standard Chartered Bank, UBS, and/or Wachovia Bank N.A..

8. Further, upon information and belief, the Defendants are currently or will soon be conducting business with another international company in U.S. dollars, and thus, the likelihood that the Defendants will send or receive their future payments through one of the banks named in Schedule "A" to the proposed ORDER DIRECTING CLERK TO ISSUE PROCESS OF MARITIME ATTACHMENT AND GARNISHMENT AND APPOINTING PROCESS SERVER is high and satisfies the reasonable belief threshold. The garnishee banks listed are limited to ones who regularly act as "intermediary banks" to effect wire transfers in U.S. Dollars between foreign originating banks and foreign beneficiary banks.

Dated: April 28, 2009  
Southport, CT

  
Charles E. Murphy

Sworn and subscribed to before me  
this 28<sup>th</sup> day of April, 2009

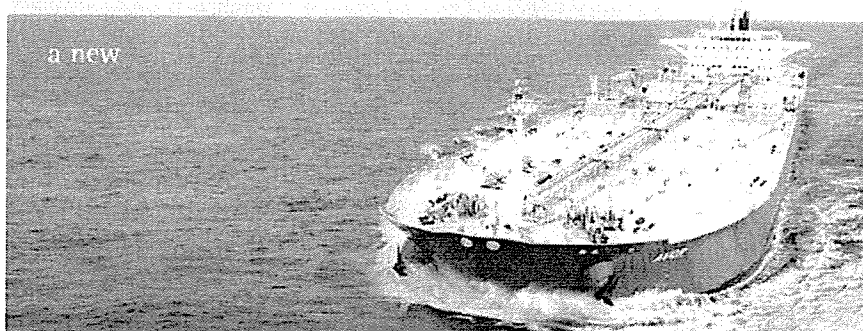
  
~~Notary Public~~/Commissioner of Superior Court

# EXHIBIT 1



GEDEN LINES

- › Geden Lines
- › History
- › Policy
- › Geden Fleet
- › New Buildings
- › G.O.L.
- › News
- › Picture Gallery
- › Human Resources
- › Contact
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## Geden Lines

In the words of Mr. Tugrul Tokgoz, the company's CEO: "The company is a shipping company who is not only having a modern fleet, but also a well managed fleet that is respected by charterers, insurers, owners of cargo, port authorities and everyone involved in the maritime industry."

Geden has developed over the many years of its operations, an excellent track record, reputation and image both within the local as well as the international shipping community. This is mainly due to the company has been committed in the shipping industry since **1975**; the management is skilled with many years of experience and has established long lasting contacts with a number of international first class charterers.

Geden operates a fleet of **22** vessels which includes 2 Aframax Crude Oil Tankers, 7 37K dwt Ice Class 1A Chemical Product Tankers, 2 47K dwt Chemical Product Tanker and 2 Capesize Bulk Carriers, 7 Supramax Bulk Carriers, 2 Handymax Bulk Carriers totalling to **1,398,350** dwt with an average age profile of **3.90** years.

### TANKERS

M/T Aqua  
M/T Action  
M/T Acor  
M/T Carry  
M/T Rova  
M/T Cotton  
M/T Cargo  
M/T Rock  
M/T Rocket  
M/T Citron  
M/T Citrus

### BULK CARRIERS

M/V Flash  
M/V Scope  
M/V Cake  
M/V City  
M/V Namrun  
M/V Tarsus  
M/V Spot  
M/V Clear  
M/V Baytur  
M/V Ulcas  
M/V Serife

Büyükdere Cad. Yapı Kredi Plaza A Blok R:12 34330 Levent - İstanbul - Turkey

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## Geden Operations Ltd.

Geden Operations Ltd(GOL) was formed in September 2005 as a wholly owned subsidiary of Geden Lines domiciled in Malta to concentrate on developing an operating presence in the handymax market.

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### TANKERS

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